Environmental Assessment

Tongue River Reservoir State Park Enhancement Addendum

September 18, 2006

MONTANA FISH, WILDLIFE & PARKS



ENVIRONMENTAL ANALYSIS MEPA/NEPA CHECKLIST

MISSION. Montana Fish, Wildlife & Parks, through its employees and citizen commission, provides for the stewardship of the fish, wildlife, parks, and recreational resources of Montana, while contributing to the quality of life for present and future generations

All Montanans have the right to live in a clean and healthful environment. This brief environmental analysis is intended to provide an evaluation of the likely impacts to the human environment from proposed actions of the project cited below. This analysis will help Montana Fish, Wildlife & Parks to fulfill its oversight obligations and satisfy rules and regulations of both the Montana Environmental Policy Act (MEPA) and the National Environmental Policy Act (NEPA). The project sponsor has a responsibility to ensure that all impacts have been addressed. Some effects may be negative; others may be positive. Please provide a discussion for each section. If no impacts are likely, be sure to discuss the reasoning that led to your determination.

Tongue River Reservoir State Park Enhancement Addendum **Draft Environmental Assessment** MEPA, NEPA, MCA 23-1-110 CHECKLIST

PART I. PROPOSED ACTION DESCRIPTION

This addendum to the original Environmental Assessment (EA) entitled "Tongue River Reservoir Enhancement" is being written because some improvements were omitted from the original EA. This addendum will only address the omissions as nothing else has been changed for the proposed project. "No alteration" will be used throughout this document to signify no change has been made from the original EA. Changes to the original EA will be italicized and in bold text. This addendum is not a stand alone document and should be read with the original EA

1. **Type of Proposed Action:**

No alteration

2. Name of Project:

Tongue River Reservoir State Park Enhancement Addendum

3. Name, Address, and Phone Number of Project Sponsor:

Cathy Stewart Parks Operations Supervisor Region 7 Headquarters Montana Fish, Wildlife & Parks PO Box 1630 Miles City, MT 59301 406-234-0926 cstewart@mt.gov

4. If Applicable:

Estimated Construction/Commencement Date: No alteration. Estimated Completion Date: No alteration.

Current Status of Project Design (percentage complete): No alteration.

5. Location Affected by Proposed Action (county, range, and township) No alteration

6. Project Size: Estimate the number of acres that would be directly affected that are currently:

No alteration

7. Map/site plan:

No alteration

8. Listing of any other Local, State, or Federal agency that has overlapping or additional jurisdiction.

No alteration

9. Narrative summary of the proposed action or project including the benefits and purpose of the proposed action.

Tongue River Reservoir State Park Description and Background No alteration

Proposed Action. Purpose, and Benefits of the Action

The proposed project is for that portion of Tongue River Reservoir State Park consisting of the park roads from Hwy. 314 to 100 yards beyond the Sand Point turn-off, Rattlesnake Point, Camper's Point, Pee Wee Point, and Sand Point. As the proposed project is extensive, proposed work will be separated by park-wide projects and specific areas (Rattlesnake Point, Camper's Point, Pee Wee Point, and Sand Point).

Park-wide projects

No alteration

Rattlesnake Point Projects

No alteration

Camper's Point Projects
No alteration

Pee Wee Point Projects

- 1. Construct a fish cleaning station (Appendix 2: Overall Site Plan, keynote #5). Currently, there is no fish cleaning station at Pee Wee Point, yet many anglers utilize this site for fishing and boat launching. The fish cleaning station will provide an environmentally safe and acceptable fish-cleaning site. The existing water system at Pee Wee Point will be modified to accommodate the additional use from the fish cleaning station. In addition, a new drain field will be designed to accommodate the septic waste from the fish cleaning station.
- 2. Pave all interior park roads at Pee Wee Point (Appendix 2: Overall Site Plan, Keynote #2). As described earlier, there is a significant dust problem within the park. Paving the interior park roads will decrease the amount of dust in the park. In addition, paving the interior roads will accommodate the number and type of visitors to the park.
- 3. Designate and improve campground campsites at Pee Wee Point.
 Camp pads will be developed, extended, and hardened in the existing campground. Currently visitors camp on undesignated areas in the

campground. The recent drought has caused the grass to die and led to dust problems in the area. This project will add control to the campground and protect the site.

4. Install picnic shelters at Pee Wee Point. With the increase in visitors to the park, more picnic shelters are needed.

Sand Point Projects

No Alteration

This environmental assessment encompasses numerous projects at the park. As with any proposed project, money and time are in a limited supply. MFWP, Region 7 has drafted a priority list for these projects based on need, time, and money. The projects have been broken down into two phases. With Phase-one, being the most needed projects and Phase-two being the next step for the park.

Priority List

Phase-one

- 1. Upgrade electrical system for the entire park
- 2. Construct a shop/maintenance building at Camper's point.
- 3. Construct employee housing at Camper's point (install a new drain field as well).
- 4. Electrify the camp loop at Camper's point.
- 5. Improve campground at Pee Wee Point and add picnic shelters
- 6. Construct a new camp loop at Sand Point.
- 7. Construct a fish cleaning station at Pee Wee Point.
- 8. Upgrade water system for the entire park
- 9. Pave interior roads at Camper's Point.
- 10. Pave interior roads at Sand Point.
- 11. Pave interior roads at Pee Wee Point.
- 12. Pave interior roads at Rattlesnake Point.

Phase-two

- 1. Pave the county road from Hwy 314 to 100 yards past Sand Point turn-off.
- 2. Construct a comfort station at Camper's Point (expand employee housing drain field).

HB495 Qualification

No alteration

PART II. ENVIRONMENTAL REVIEW

1. Description and analysis of reasonable alternatives (including the no action alternative) to the proposed action whenever alternatives are reasonably available and prudent to consider and a comparison of the alternatives with the proposed action/preferred alternative:

Alternative A: No Action
No alteration

Alternative B: Proposed Project

The proposed project will consist of:

- 1. Provide upgraded electrical from Tongue River Dam to the park
- 2. Pave the county road from HWY 314 to a point approximately 100 yards past Sand Point Turn off
- 3. Upgrade the water system park wide
- 4. Pave and improve interior park roads at Rattlesnake Point
- 5. Construct new employee housing at Camper's Point
- 6. Install electrical pedestals at existing camp pads at Camper's Point
- 7. Install a new drain field at Camper's point
- 8. Construct a new maintenance and enforcement shop/storage building at Camper's point
- 9. Construct a comfort station at Camper's Point
- 10. Pave interior park roads at Camper's Point
- 11. Construct a fish cleaning station at Pee Wee Point
- 12. Pave interior park roads at Pee Wee Point
- 13. Designate and improve campground campsites at Pee Wee Point 14. Install picnic shelters at Pee Wee Point
- 15. Install a new camp loop with 36 new camp pads at Sand Point
- 16. Pave interior park roads at Sand Point.

The proposed project will result in adequate development, to meet current use patterns in the park. Upgrading the electrical service and water systems at Camper's Point and Pee Wee Point will allow for the proposed development. Paving the county road and all interior park roads will decrease dust in the park. In addition, paving will ease visitor access to all portions of the park with larger vehicles, trailers, and campers. Constructing new employee housing will accommodate employees on site, decrease employee travel costs, contribute to employee retention, and encourage more potential employees to apply for positions at the park. Electrifying the camp loop at camper's point will meet the expectations of visitors traveling with RV's and Motorboats. It will also decrease noise in the campground from generator usage and reduce possible environmental and safety issues by eliminating or at the very least reducing the number and amount of portable gasoline containers in the campground. Constructing a new drain field at Camper's Point must be done before new employee housing and the comfort station can be constructed. The comfort station will enhance the public's

camping and recreational experience at this existing high-use area. Constructing a new shop/storage area and expanding current dry dock storage will accommodate the equipment and projects performed by park employees. The fish cleaning station will provide an environmentally safe and acceptable fish-cleaning site. *Improving the campground at Pee Wee Point will allow for site control and protection. Installing picnic shelters at Pee Wee Point will meet visitors' expectations.* Constructing a new camp loop at Sand Point will accommodate the increased usage at this site.

2. Evaluation and listing of mitigation, stipulation, or other control measures enforceable by the agency or another government agency:

No alteration

PART III. NARRATIVE EVALUATION AND COMMENT

No alteration

PART IV. PUBLIC PARTICIPATION

1. Describe the level of public involvement for this project if any, and, given the complexity and the seriousness of the environmental issues associated with the proposed action, is the level of public involvement appropriate under the circumstances?

The public will be notified in the following ways to comment on the **addendum to the** EA of for the Tongue River Reservoir State Park Enhancement

- 1. Legal notices will be published in the *Billings Gazette*, *Helena Independent Record*, and the *Miles City Star*.
- 2. Legal notice and the draft EA will be posted on the Montana Fish, Wildlife, & Parks web page: http://fwp.mt.gov/publicnotices
- 3. The cover sheet will be mailed to known and potentially interested members of the public, Governmental organizations, and others.

This level of public involvement is appropriate for a project of this scale.

2. Duration of comment period, if any.

The public comment period will be 30 days. Comments may be emailed to cstewart@mt.gov, or written comments may be sent to the following address:

Cathy Stewart
Region 7 MFWP Parks Operations Supervisor
PO Box 1630
Miles City, MT 59301
406-234-0926
cstewart@mt.gov

PART V. EA PREPARATION

Based on the significance criteria evaluated in this EA, is an EIS required?
 NO

If an EIS is not required, explain why the EA is the appropriate level of analysis for this proposed action.

No alteration

2. Name, title, address, and phone number of the person(s) responsible for preparing the EA:

Cathy Stewart Region 7 MFWP Parks Operations Supervisor PO Box 1630 Miles City, MT 59301 406-234-0926 Sally Schrank Independent Contractor 112 Riverview C Great Falls, MT 59404 (406) 268-0527

3. List of agencies consulted during preparation of the EA:

No alteration

PART VI. MEPA CHECKLIST

Evaluation of the impacts of the Proposed Action including secondary and cumulative impacts on the Physical and Human Environment.

A. PHYSICAL ENVIRONMENT

1. LAND RESOURCES		IMF				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Soil instability or changes in geologic substructure?			Х			1a.
b. Disruption, displacement, erosion, compaction, moisture loss, or over-covering of soil which would reduce productivity or fertility?			Х			1b.
c. Destruction, covering or modification of any unique geologic or physical features?		Х				
d. Changes in siltation, deposition or erosion patterns that may modify the channel of a river or stream or the bed or shore of a lake?		X				
e. Exposure of people or property to earthquakes, landslides, ground failure, or other natural hazard?		Х				
f. Other		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

1a. No alteration

2. AIR		IM				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Emission of air pollutants or deterioration of ambient air quality? (also see 13 (c))			Х			2a.
b. Creation of objectionable odors?			X			2b.
c. Alteration of air movement, moisture, or temperature patterns or any change in climate, either locally or regionally?		Х				
d. Adverse effects on vegetation, including crops, due to increased emissions of pollutants?		Х				
e. <u>For P-R/D-J projects</u> , will the project result in any discharge which will conflict with federal or state air quality regs? (Also see 2a)		Х				2e.
f. Other		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Air Resources (Attach additional pages of narrative if needed):

- 2a. No alteration
- 2b. No alteration
- 2e. No alteration

3. WATER		IM				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Discharge into surface water or any alteration of surface water quality including but not limited to temperature, dissolved oxygen or turbidity?			Х			3a.
b. Changes in drainage patterns or the rate and amount of surface runoff?			Х			3b.
c. Alteration of the course or magnitude of flood water or other flows?			Х			3c.
d. Changes in the amount of surface water in any water body or creation of a new water body?		Х				
e. Exposure of people or property to water related hazards such as flooding?		Х				
f. Changes in the quality of groundwater?		Х				
g. Changes in the quantity of groundwater?		Х				
h. Increase in risk of contamination of surface or groundwater?			Х			3h.
i. Effects on any existing water right or reservation?		Х				
j. Effects on other water users as a result of any alteration in surface or groundwater quality?		Х				
k. Effects on other users as a result of any alteration in surface or groundwater quantity?		Х				
I. <u>For P-R/D-J</u> , will the project affect a designated floodplain? (Also see 3c)		Х				31.
m. <u>For P-R/D-J</u> , will the project result in any discharge that will affect federal or state water quality regulations? (Also see 3a)		Х				3m.
n. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Water Resources (Attach additional pages of narrative if needed):

- 3a. **No alteration**
- 3b. No alteration
- 3c. No alteration
- 3h. No alteration
- 3l. No alteration
- 3m. No alteration

4. VEGETATION		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Changes in the diversity, productivity or abundance of plant species (including trees, shrubs, grass, crops, and aquatic plants)?			Х			4a.
b. Alteration of a plant community?			X			See 4a.
c. Adverse effects on any unique, rare, threatened, or endangered species?		Х				4c.
d. Reduction in acreage or productivity of any agricultural land?		Х				
e. Establishment or spread of noxious weeds?			Х		Yes	4e.
f. For P-R/D- J, will the project affect wetlands, or prime and unique farmland?		Х				4f.
g. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

- 4a. No alteration
- 4c. No alteration
- 4e. No alteration
- 4f. No alteration

5. FISH/WILDLIFE		IM				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Deterioration of critical fish or wildlife habitat?		Х				5a.
b. Changes in the diversity or abundance of game animals or bird species?		Х				See 5a.
c. Changes in the diversity or abundance of nongame species?		Х				See 5a.
d. Introduction of new species into an area?		Х				
e. Creation of a barrier to the migration or movement of animals?		Х				
f. Adverse effects on any unique, rare, threatened, or endangered species?		Х				5f.
g. Increase in conditions that stress wildlife populations or limit abundance (including harassment, legal or illegal harvest or other human activity)?		Х				
h. <u>For P-R/D-J</u> , will the project be performed in any area in which T&E species are present, and will the project affect any T&E species or their habitat? (Also see 5f)		Х				See 5f.
i. <u>For P-R/D-J</u> , will the project introduce or export any species not presently or historically occurring in the receiving location? (Also see 5d)		Х				5i.
j. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

- 5a. No alteration
- 5f. No alteration
- 5i. No alteration

6. NOISE/ELECTRICAL EFFECTS		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Increases in existing noise levels?			Х			6a.
b. Exposure of people to severe or nuisance noise levels?		Х				
c. Creation of electrostatic or electromagnetic effects that could be detrimental to human health or property?		Х				
d. Interference with radio or television reception and operation?		Х				
e. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

7. LAND USE		IN				
Will the proposed action result in:	Unknown∍	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of or interference with the productivity or profitability of the existing land use of an area?		Х				7a.
b. Conflicted with a designated natural area or area of unusual scientific or educational importance?		Х				
c. Conflict with any existing land use whose presence would constrain or potentially prohibit the proposed action?		Х				
d. Adverse effects on or relocation of residences?		Х				
e. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

8. RISK/HEALTH HAZARDS		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Risk of an explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation) in the event of an accident or other forms of disruption?			X		Yes	8a.
b. Affect an existing emergency response or emergency evacuation plan or create a need for a new plan?		Х				
c. Creation of any human health hazard or potential hazard?		Х				
d. <u>For P-R/D-J</u> , will any chemical toxicants be used? (Also see 8a)			Х			See 8a.
e. Other:		Х				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

9. COMMUNITY IMPACT		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of the location, distribution, density, or growth rate of the human population of an area?		Х				9a.
b. Alteration of the social structure of a community?		Х				
c. Alteration of the level or distribution of employment or community or personal income?		Х				
d. Changes in industrial or commercial activity?		Х				
e. Increased traffic hazards or effects on existing transportation facilities or patterns of movement of people and goods?		Х				9e.
f. Other:		Х				_

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

9a. No alteration

10. PUBLIC SERVICES/TAXES/UTILITIES		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Will the proposed action have an effect upon or result in a need for new or altered governmental services in any of the following areas: fire or police protection, schools, parks/recreational facilities, roads or other public maintenance, water supply, sewer or septic systems, solid waste disposal, health, or other governmental services? If any, specify:			Х			10a.
b. Will the proposed action have an effect upon the local or state tax base and revenues?		Х				
c. Will the proposed action result in a need for new facilities or substantial alterations of any of the following utilities: electric power, natural gas, other fuel supply or distribution systems, or communications?			Х			
d. Will the proposed action result in increased used of any energy source?			Х			
e. Define projected revenue sources						10e.
f. Define projected maintenance costs.						10f
g. Other:						

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

10a. No alteration

10e. No alteration

11. AESTHETICS/RECREATION		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of any scenic vista or creation of an aesthetically offensive site or effect that is open to public view?		Х				
b. Alteration of the aesthetic character of a community or neighborhood?		Х				
c. Alteration of the quality or quantity of recreational/tourism opportunities and settings? (Attach Tourism Report)			X			11c.
d. <u>For P-R/D-J</u> , will any designated or proposed wild or scenic rivers, trails or wilderness areas be impacted? (Also see 11a, 11c)		Х				11d.
e. Other:		NA				

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

11c. No alteration

12. CULTURAL/HISTORICAL RESOURCES		IN				
Will the proposed action result in:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Destruction or alteration of any site, structure or object of prehistoric, historic, or paleontological importance?		Х				12a.
b. Physical change that would affect unique cultural values?		Χ				
c. Effects on existing religious or sacred uses of a site or area?		Х				
d. <u>For P-R/D-J</u> , will the project affect historic or cultural resources? Attach SHPO letter of clearance. (Also see 12.a)		Х				See 12a.
e. Other:						

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

13. <u>SUMMARY EVALUATION OF</u> <u>SIGNIFICANCE</u>		IMPACT				
Will the proposed action, considered as a whole:	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Have impacts that are individually limited, but cumulatively considerable? (A project or program may result in impacts on two or more separate resources which create a significant effect when considered together or in total.)		Х				13a.
b. Involve potential risks or adverse effects which are uncertain but extremely hazardous if they were to occur?		Х				
c. Potentially conflict with the substantive requirements of any local, state, or federal law, regulation, standard or formal plan?		Х				
d. Establish a precedent or likelihood that future actions with significant environmental impacts will be proposed?		Х				
e. Generate substantial debate or controversy about the nature of the impacts that would be created?		Х				
f. <u>For P-R/D-J</u> , is the project expected to have organized opposition or generate substantial public controversy? (Also see 13e)		Х				13f.
g. For P-R/D-J, list any federal or state permits required.		Х				13g.

Narrative Description and Evaluation of the Cumulative and Secondary Effects on Land Resources (Attach additional pages of narrative if needed):

- 13a. No alteration
- 13f. No alteration
- 13g. No alteration

APPENDIX 1

HB495

PROJECT QUALIFICATION CHECKLIST

Date September 10, 2006 Person Reviewing Sally Schrank

Project Location: Tongue River Reservoir State Park is located on Tongue River Reservoir, Bighorn County. It is located six miles north of Decker on Secondary 314, then 1 mile east on county road. The proposed project will occur in Range 40 E, Township 8 S, Sections 25,26,35.

Description of Proposed Work: The proposed project will consist of:

- 1. Provide upgraded electrical from Tongue River Dam to the park
- 2. Pave the county road from HWY 314 to 100 yards past Sand Point Turn off
- 3. Upgrade the water system park wide
- 4. Pave and improve interior park roads at Rattlesnake Point
- 5. Construct new employee housing at Camper's Point
- 6. Install electrical Pedestals at existing camp pads at Camper's Point
- 7. Install a new drain field at Camper's point
- 8. Construct a new maintenance and enforcement shop/storage building at Camper's point
- 9. Construct a Comfort Station at Camper's Point
- 10. Expand existing dry dock storage at Camper's Point
- 11. Pave interior park roads at Camper's Point
- 12. Construct a Fish Cleaning Station at Pee Wee Point
- 13. Designate and Improve campsites at Pee Wee Point
- 14. Install picnic shelters at Pee Wee Point
- 15. Pave interior park roads at Pee Wee Point
- 16. Install a new camp loop with 35 new pads at Sand Point
- 17. Pave interior park roads at Sand Point.

The following checklist is intended to be a guide for determining whether a proposed development or improvement is of enough significance to fall under HB 495 rules. (Please check _ all that apply and comment as necessary.)

- [] A. New roadway or trail built over undisturbed land? Comments:
- [Y] B. New building construction (buildings <100 sf and vault latrines exempt)? Comments: New employee housing, a fish cleaning station, comfort station, and a shop/storage building will be constructed.
- [Y] C. Any excavation of 20 c.y. or greater?

 Comments: The construction of new employee housing, shop/storage building, fish cleaning station, and comfort station will be cause excavation of greater than 20 c.y. In

		new drain fields, upgrading the water system, and constructing the new ill cause an excavation of greater than 20 c.y.			
[]	D.	New parking lots built over undisturbed land or expansion of existing that increases parking capacity by 25% or more?			
Con	nments:	and meredeed parising expansity by 2070 crimero.			
[]	E.	Any new shoreline alteration that exceeds a double wide boat ramp or handicapped fishing station?			
Com	nments:	nanaloapped horning station:			
[] Com	F. nments:	Any new construction into lakes, reservoirs, or streams?			
[]	G.	Any new construction in an area with National Registry quality cultural artifacts (as determined by State Historical Preservation Office)?			
[Y] Com	H. nments:_	Any new above ground utility lines? Upgrading the electrical system for the entire park will include the of above ground utility lines.			
[Y]	I.	Any increase or decrease in campsites of 25% or more of an existing number of campsites?			
	nments:_ d Point	A new camp loop with approximately 35 new pads will be constructed at			
[] Com	J. nments:	Proposed project significantly changes the existing features or use pattern; including effects of a series of individual projects?			

If any of the above are checked, HB 495 rules apply to this proposed work and should be documented on the MEPA/HB495 CHECKLIST. Refer to MEPA/HB495 Cross Reference Summary for further assistance.

Appendix 2 Site Plan No alteration

APPENDIX 3
TOURISM REPORT
No alteration

Appendix 4
GLOSSARY OF TERMS
No alteration